

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Daniel MALDONADO
Felix MALDONADO Jr.

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/16/2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21 Sec. 846, 841

Offense Description

Knowingly and intentionally possess with the intent to distribute a controlled substance, to wit, approximately 2 kilograms of cocaine.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet.

/s/ Roberto Reyna

Complainant's signature

SA Roberto Reyna, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/20/2021

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, US Magistrate Judge

Printed name and title

ATTACHMENT A

On December 16, 2021, at approximately 2:00 p.m., Webb County Sherriff Office (WCSO) Deputy Luis Lozano was working his assigned duties along FM 359 in Webb County, Texas. WCSO Deputy Lozano conducted a traffic stop on a white four-door Ford pickup truck bearing Texas license plates for a violation of **Texas Transportation Code §547.613 (a)(1) Restrictions on Windows** that occurred on FM 359. The traffic stop was conducted at the intersection of FM 359 and Maria Luisa. During the traffic stop, WCSO Deputy Lozano conducted an inspection of the driver and the pickup truck. During the inspection, WCSO Deputy Lozano obtained verbal consent from the driver, Daniel MALDONADO, to search the pickup truck. During the search of the pickup truck, WCSO Deputy Lozano discovered a black in color grocery bag which contained two bundles wrapped in cellophane. WCSO Deputy Lozano detained MALDONADO for further investigation. At this same time, WCSO Deputy Lozano also placed MALDONADO's passenger, Felix MALDONADO Jr., in custody. MALDONADO was subsequently issued a citation for traffic violation by WCSO Deputy Lozano.

WCSO Deputy Lozano contacted the Laredo District Office (LDO) Drug Enforcement Administration (DEA) Special Agents (SA) for further investigation.

Upon arrival at the Laredo DEA Office, MALDONADO Jr. was read his Miranda Rights in the English language. MALDONADO Jr. agreed to speak to DEA Agents without the presence of an attorney. During the interview, MALDONADO Jr. stated that he had been contacted by an unknown male in Laredo, Texas that wanted to purchase 2 kilograms of cocaine. MALDONADO Jr. stated that the unknown male had agreed to meet with him to purchase the two bundles of suspected cocaine wrapped in cellophane. During the course of the interview, MALDONADO Jr. agreed to a consensual search of his residence where an undetermined amount of bulk currency was discovered and seized by Agents.

DEA Agents subsequently interviewed MALDONADO, the driver of white pickup, who admitted to knowing he was facilitating in the sale of 2 kilos of cocaine. MALDONADO further stated that he had facilitated the sale of cocaine on another occasion where he was compensated monetarily.

At the conclusion of the interview MALDONADO and MALDONADO Jr. were transported by DEA Special Agents to the Webb County Jail, where they were turned over to the facility pending their initial appearance with a US Magistrate Judge.

DEA Agents conducted a field test on the suspected bundles which resulted in a positive result for cocaine. The total weight of the two bundles was approximately 2 kilograms.